

EXHIBIT BB

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DECLARATION OF JUSTIN BART

I, Justin Bart, do hereby state and declare under penalty of perjury of the laws of the United States of America and the State of Nevada that the assertions in this declaration are true and correct based upon my own personal knowledge.

1. I am currently employed by Renown Health ("the Company") and have been since April, 22, 2002. I currently hold the position of Executive Chef and have been in this role since January 2018. Prior to that time, I held the position of Manager of Food & Nutrition Services from May 2015 to January 2018 and prior to that, Supervisor of Food and Nutrition Services from April 2002 to May 2015.

2. I never interfered with Lucero Sanchez's duties. I never discriminated or retaliated against Ms. Sanchez.

3. I never witnessed any employee of the Company, including Christina Vargas, discriminate or retaliate against Ms. Sanchez.

4. When Ms. Sanchez held the position of FNS Coordinator, she shared an office with Kristin Foley, who held the position of Systems Specialist.

5. I was involved in the decision to eliminate the position of FNS Coordinator and did so because the Company was not hosting catering or other special events at the South Meadows location. In other words, the duties of the FNS Coordinator position were not being performed and there was no need for the position.

6. When the position of FNS Coordinator was eliminated, the Company transferred Ms. Sanchez to the position of Food Services Cashier. Ms. Sanchez had no need to use an office when she assumed the Cashier position. Therefore, the office that Ms. Sanchez previously used was now available for Ms. Foley's sole use.

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1 7. My decision to eliminate the position of FNS Coordinator, which remains
2 eliminated and unfilled today, was based purely upon legitimate, business needs and
3 operations.

4 Executed this 15 day of November, 2018, in Reno, Nevada.

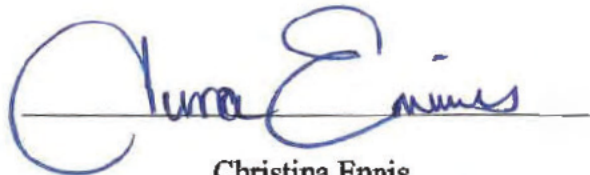
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CERTIFICATE OF CUSTODIAN OF RECORDS

STATE OF NEVADA,)
)
COUNTY OF CLARK)

Comes now, Christina Ennis, who, being first duly sworn, deposes and says:

1. That I am the Custodian of Records for the State of Nevada, Department of Employment, Training and Rehabilitation, Nevada Equal Rights Commission.
2. That on the November 4, 2021, I was served with a subpoena in connection with Lucero Sanchez vs. Renown Health NERC No. 0112-18-0007R EEOC No. 34B-2017-01343.
3. That I have examined both the original and electronic file of those records and have made a true and exact copy of them and that the electronic reproduction of them attached hereto is true and complete, except for those documents protected by the attorney-client privilege and/or those documents that are not subject to disclosure pursuant to NRS 233.190.
4. That the original of those records were made at or near the time of the acts or events recited therein by or from information transmitted by a person with knowledge in the course of a regularly conducted activity of the office or institution in which I am engaged.



Christina Ennis
Administrative Assistant II

SUBSCRIBED AND SWORN to before me
This 27th day of DECEMBER, 2021.


NOTARY PUBLIC

